IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

LANCE AND CHRISTIANA TORBETT	.)	
as biological parents and next friends of)	
minor Plaintiff L.T.,)	
)	
Plaintiffs,)	
)	
v.)	No. 2:25-cv-00033-DCLC-CRW
)	JURY DEMANDED
PROVIDENCE ACADEMY,)	
)	
Defendant.)	

MOTION TO AMEND COMPLAINT

Comes the Plaintiffs, by and through counsel, and respectfully moves the Court pursuant to Federal Rules of Civil Procedure 15 for the entry of an Order allowing Plaintiffs to amend their Complaint to more particularly identify the facts and circumstances of the Plaintiff's action as argued in Defendant's Motion to Dismiss, as well as delete certain actions as argued in Defendant's Motion to Dismiss. A copy of the Proposed Amended Complaint is attached as **Exhibit** A.

WHEREFORE, it is respectfully requested that Plaintiffs be allowed to amend their Complaint and that the Proposed Amended Complaint be filed within ten (10) days of the Court ruling on the instant Motion if the Court's determination is favorable to the Plaintiffs.

Respectfully submitted this 17th day of June, 2025.

ARTHUR F. KNIGHT, III

s/Arthur F. Knight, III Arthur F. Knight, III, BPR #016178 Law Office of Arthur F. Knight, III 3248 Tazewell Pike, Suite 103 Knoxville, TN 37918 P: (865) 252-0430 Email: art@artknightlaw.com Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, a copy of the foregoing Motion to Amend Complaint was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ Arthur F. Knight, III
Arthur F. Knight, III